#### A. Claim 1

Applicant submits that claim 1 is patentable over the cited reference. For example, claim 1 recites that spooled print data is converted into display data and displayed on a displaying device.

The Examiner maintains that col. 9, lines 9-17 of Takeda disclose such a feature. The cited portion of Takeda discloses that the file in each spool area is displayed on display unit 221 (col. 9, lines 10-12). However, the cited portion refers to an example shown in Fig. 6 (col. 9, lines 12-13). As shown in Fig. 6, just the actual file "name" is displayed on display unit 221. Applicant submits that the display of a file "name" does not teach or suggest the display of display data, as recited in claim 1.

In addition, the reference just states that the file (i.e. file name) in each spool area is displayed on display unit 221 (col. 9, lines 10-12). Such disclosure fails to state that the file of the spool area is converted into display data "prior to" display on display unit 221. Therefore, even if Applicant assumes *arguendo* that the file in each spool area discloses the claimed spooled print data, the reference fails to teach or disclose that the spooled file is converted <u>before</u> display on display unit 221.

If the Examiner wishes to persist in this rejection, Applicant respectfully requests that the Examiner specifically clarify which portion of Takeda discloses that the file in each spool area is converted before being displayed.

Claim 1 further discloses that edited display data is inversely converted into a structure of spooled print data.

The Examiner maintains that Shaw discloses such a feature in col. 5, lines 42-65. Based on the disclosure of the cited portion of Shaw, Applicant assumes that the Examiner maintains that the enhanced metafile discloses the edited display data. However, the reference just states that the metafile (i.e. edited display data) is spooled (col. 5, line 59). Therefore, Applicant submits that such feature fails to teach or disclose the inverse conversion of edited display data into a structure of a spooled print data. For example, since it is the metafile itself which is spooled, the reference cannot also teach that the metafile is inversely converted into a structure of the spooled print data.

Further, as stated in claim 1, the claimed spooled print data is data which <u>can be</u> printed by a printing device. On the contrary, Shaw discloses that "<u>instead of</u> the document being converted <u>into a format specific to the selected printer</u>, the document is converted into the enhanced metafile format and spooled" (emphasis added; col. 5, lines 57-59). Therefore, it appears that the spooled metafile may not be data which can be printed by the printer device (i.e. a format specific to the selected printer). Thus, Applicant submits the metafile cannot alternatively disclose the claimed spooled print data.

If on the other hand, Applicant assumes that the Examiner maintains that the "document", which is initially converted into the metafile, discloses the claimed edited display data, Shaw still fails to teach or suggest the cited feature (col. 5, lines 54-59). For example, the initial document, which is converted into the metafile, is a document requested to be printed by workstation 20

(i.e. a user) (col. 5, lines 41-59). Therefore, such requested document is not data which was previously converted into display data and edited, as required by claim 1.

In light of the above, Applicant submits that Shaw fails to teach or disclose the claimed inverse conversion of edited display data into a structure of the spooled print data, and likewise fails to cure the deficient teachings of Takeda.

Accordingly, Applicant submits that claim 1 is patentable over the cited reference.

#### **B.** Claims 2-6

Since claims 2-6 are dependent, either directly or indirectly, upon claim 1, Applicant submits that such claims are patentable at least by virtue of their dependency.

#### C. Claim 7

Since claim 7 contains features which are analogous to the features recited in claim 1, Applicant submits that claim 7 is patentable over the cited reference for at least analogous reasons as presented above.

# D. Claims 8 and 9

Since claims 8 and 9 are dependent upon claim 7, Applicant submits that such claims are patentable at least by virtue of their dependency.

Amendment under 35 U.S.C. § 1.111 U.S. Application No. 09/240,695

### E. Claim 10

Since claim 10 contains features which are analogous to the features recited in claim 1, Applicant submits that claim 10 is patentable over the cited reference for at least analogous reasons as presented above.

# F. Claims 11-16

Since claims 11-16 are dependent, either directly or indirectly, upon claim 1, Applicant submits that such claims are patentable at least by virtue of their dependency.

# G. Claim 17

Since claim 17 contains features which are analogous to the features recited in claim 1, Applicant submits that claim 17 is patentable over the cited reference for at least analogous reasons as presented above.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Amendment under 35 U.S.C. § 1.111 U.S. Application No. 09/240,695

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

Allison M. Bowles Tulino

Registration No. 48,294

Alleren M. Tulino

SUGHRUE MION, PLLC

Telephone: (202) 293-7060 Facsimile: (202) 293-7860

washington office

23373

CUSTOMER NUMBER

Date: December 8, 2003